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VIA ECF

May 24, 2010

Re: Utah Retirement Systems v. Michael Strauss, et al., 09 Civ. 3221 (TCP) (ETB)

Honorable Thomas C. Platt
United States District Judge
United States District Court
for the Eastern District of New York
Long Island Courthouse
1044 Federal Plaza
Central Islip, New York 11722-9014

Dear Judge Platt:

We represent Defendant Michael Strauss in the above-captioned action. The parties have exchanged moving and opposition memoranda in connection with Defendants' motions to dismiss the amended complaint of the Utah Retirement System ("URS") and reply memoranda are currently due to be exchanged on June 3, 2010. We have conferred with counsel for all parties and write on behalf of certain Defendants to respectfully request an extension of the Court's page limits for reply memoranda, as set forth below.

On March 18, 2010, the parties exchanged Defendants' motions to dismiss URS' amended complaint. The 112 page, 342 paragraph complaint names nine Individual Defendants,¹ two Underwriter Defendants and one Auditor Defendant and challenges numerous public statements over a multi-year period under the Securities Act of 1933 and the Securities Exchange Act of 1934, as well as statutory and common law. With the Court's permission, Mr. Strauss served one memorandum in support of his motion totaling sixty-three pages and the other eight Individual Defendants, who are separately represented, joined in Mr. Strauss' memorandum and served four separate memoranda totaling thirty pages in all focused on issues specific to them. Deloitte & Touche LLP, the Auditor Defendant, and Citigroup Global Markets Inc. and Citigroup Inc., the Underwriter Defendants, served separate memoranda of thirty-five and twenty-five pages, respectively.

Consistent with the parties' stipulation ordered by the Court, on May 3, 2010 Plaintiff served an Omnibus Opposition to Defendants' Motions to Dismiss. The Omnibus Opposition is 129 pages in length.

¹ The additional Individual Defendants are Stephen A. Hozie, Robert Bernstein, John A. Johnston, Michael A. McManus, Jr., C. Cathleen Raffaelli, Nicholas R. Marfino, Kenneth P. Slosser, and Irving J. Thau.

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On behalf of Mr. Strauss and in an effort to avoid duplication in reply briefing, we respectfully request permission to file a reply memorandum in further support of Mr. Strauss's motion to dismiss not to exceed thirty-five pages. The other eight Individual Defendants intend to join in Mr. Strauss' reply memorandum and to file no more than four separate memoranda each not to exceed the Court's ten page limit for reply memoranda. The Underwriter Defendants respectfully request permission to file a reply memorandum in further support of their motion not to exceed thirteen pages.

Plaintiff has no objection to this request. Thank you for Your Honor's consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul C. Curnin". The signature is stylized with a large, looped "P" and a cursive "Curnin".

Paul C. Curnin

cc: Honorable E. Thomas Boyle
All Counsel via ECF